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BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, DC 20268-0001

ANNUAL COMPLIANCE REVIEW

2019 Docket No. ACR2019

MOTION FOR INFORMATION REQUEST NO. 4, SEEKING CLARIFICATION OR CORRECTION OF SERVICE PERFORMANCE REPORT STEVE HUTKINS

(October 13, 2020)

On October 7, 2020, the Postal Service submitted an Excel file showing weekly service performance results at the national, area, and district levels for the weeks of May 30, 2020 – September 25, 2020.¹ In a motion submitted the previous day, the Postal Service stated that in preparing these weekly reports for the Commission it would utilize the same resources that it used to prepare reports for Congress and in response to recent orders from federal courts, including *Jones v. United States Postal Service*, (No. 20 Civ. 6516).²

In comparing the Excel file submitted to the Commission on October 7, 2020, and the data submitted in *Jones* on October 2, 2020, there appear to be some inconsistencies, as shown in the following tables. The first table contains on-time scores extracted from the national-level variance report submitted in *Jones*; the second

¹ Responses of The United States Postal Service to Revised Questions 1-2 of Commission Information Request No. 3, Oct. 7, 2020, CIR.3.Oct.7.Wkly.ServPerf.Attachmnt.xlsx.

² Motion for Further Relief to Submit Complete Response of The United States Postal Service to Revised Commission Information Request No. 3, Oct. 6, 2020, Footnote 6 at 4

contains the national scores submitted to the Commission. (Appended to this motion is the pdf document with variance data submitted by the Postal Service in *Jones*.³)

Service Performance Scores Submitted in Jones v USPS					
Week	Overnight	Presort 2- day	Presort 3-5 day	Single piece 2-day	Single piece 3-5 day
7/18/20	90.35%	86.81%	81.63%	85.06%	66.73%
7/25/20	89.67%	87.27%	83.46%	86.43%	69.63%
8/1/20	89.31%	86.97%	82.62%	85.54%	67.69%
8/8/20	90.34%	85.42%	80.35%	85.33%	66.41%
8/15/20	92.89%	90.03%	84.12%	87.82%	71.71%
8/22/20	94.02%	91.55%	86.55%	89.35%	75.64%
8/29/20	94.25%	91.16%	86.70%	90.21%	76.55%
9/5/20	94.44%	92.17%	87.31%	89.71%	78.83%

Service Performance Scores Submitted to PRC					
Week	Overnight	Presort 2- day	Presort 3-5 day	Single piece 2-day	Single piece 3-5 day
7/18/20	90.36%	86.83%	81.62%	85.06%	66.73%
7/25/20	89.67%	87.24%	83.44%	86.43%	69.63%
8/1/20	89.34%	86.99%	82.64%	85.54%	67.69%
8/8/20	90.40%	85.47%	80.37%	85.33%	66.41%
8/15/20	93.00%	90.11%	84.18%	87.82%	71.72%
8/22/20	94.51%	91.90%	86.77%	89.91%	76.99%
8/29/20	94.80%	91.76%	86.83%	90.73%	77.83%
9/5/20	94.72%	92.57%	87.33%	90.37%	81.78%

While many of the discrepancies are tiny, some seem significant enough to call to the Commission's attention. I respectfully request that the Commission ask the Postal Service to clarify if the two reports should have the same scores and, if so, to make whatever corrections may be necessary, in either the data submitted in *Jones* or the

³ Jones v. United States Postal Service, Case 1:20-cv-06516-VM Document 68-2 Filed 10/02/20

data submitted to the Commission. It would also be helpful if the Postal Service checked to see if there are any inadvertent errors in the area-level and district-level scores that are associated with the national numbers reported to the Commission.

Respectfully submitted,

By: _/s/ Steve Hutkins PO Box 43 Rhinecliff, NY 12574 ssh1@nyu.edu Please note that scores provided for each week in a quarter may not exactly match the official scores filed with the Postal Regulatory Commission (PRC) at the end of the quarter.

Week		Over	night
	Overall Score	Percent Within +1-Day	Percent Within +2-Day
1/1/2020	97.71%	99.03%	99.49%
1/4/2020	96.33%	98.84%	99.39%
1/11/2020	95.55%	98.52%	99.21%
1/18/2020	95.55%	98.63%	99.28%
1/25/2020	95.23%	98.26%	99.03%
2/1/2020	95.38%	98.56%	99.22%
2/8/2020	95.77%	98.55%	99.25%
2/15/2020	96.51%	98.80%	99.36%
2/22/2020	96.19%	98.61%	99.32%
2/29/2020	95.98%	98.69%	99.26%
3/7/2020	95.71%	98.39%	99.05%
3/14/2020	95.86%	98.54%	99.18%
3/21/2020	95.97%	98.54%	99.10%
3/28/2020	95.45%	98.53%	99.19%
4/1/2020	96.37%	98.68%	99.21%
4/4/2020	95.48%	98.35%	99.15%
4/11/2020	94.42%	97.60%	98.71%
4/18/2020	95.63%	98.44%	99.14%
4/25/2020	95.74%	98.32%	99.02%
5/2/2020	95.91%	98.46%	99.18%
5/9/2020	95.96%	98.44%	99.11%
5/16/2020	95.88%	98.53%	99.18%
5/23/2020	96.38%	98.75%	99.30%
5/30/2020	95.53%	98.63%	99.27%
6/6/2020	95.65%	98.47%	99.16%
6/13/2020	96.07%	98.54%	99.22%
6/20/2020	95.72%	98.53%	99.16%
6/27/2020	95.25%	98.59%	99.32%
7/1/2020	96.52%	98.53%	99.14%
7/4/2020	95.17%	98.30%	99.08%
7/11/2020	92.21%	97.60%	98.64%
7/18/2020	90.35%	96.79%	98.53%
7/25/2020	89.67%	96.15%	98.16%
8/1/2020	89.31%	96.06%	98.14%
8/8/2020	90.34%	96.19%	97.91%
8/15/2020	92.89%	97.36%	98.67%
8/22/2020	94.02%	98.02%	98.94%
8/29/2020	94.25%	98.22%	99.09%
9/5/2020	94.44%	98.27%	99.18%
9/12/2020	93.92%	98.55%	99.40%
9/19/2020	94.42%	98.57%	99.37%

	Presort First-Class		
	Two-Day		
Percent Within +3-Day	Overall Score	Percent Within +1-Day	Percent Within +2-Day
99.66%	93.05%	97.68%	99.13%
99.58%	94.55%	98.09%	99.03%
99.45%	94.36%	98.13%	99.09%
99.50%	94.62%	98.31%	99.13%
99.33%	93.99%	97.98%	99.08%
99.48%	93.55%	97.80%	98.98%
99.51%	94.11%	98.05%	99.04%
99.57%	95.52%	98.56%	99.27%
99.55%	94.65%	98.11%	99.05%
99.49%	94.83%	98.22%	99.10%
99.41%	94.46%	98.05%	99.03%
99.44%	94.22%	98.13%	99.06%
99.37%	94.98%	98.28%	99.07%
99.50%	94.09%	98.32%	99.19%
99.49%	95.16%	97.70%	98.74%
99.43%	93.69%	97.62%	98.77%
99.27%	92.45%	96.62%	98.10%
99.47%	92.57%	96.80%	98.14%
99.35%	92.66%	96.89%	98.25%
99.44%	92.24%	96.95%	98.35%
99.39%	91.70%	96.96%	98.42%
99.43%	92.80%	97.63%	98.71%
99.55%	94.17%	97.83%	99.01%
99.55%	94.05%	98.02%	99.05%
99.43%	93.57%	97.72%	98.82%
99.49%	94.21%	98.01%	99.01%
99.44%	94.05%	98.02%	99.02%
99.60%	93.34%	98.21%	99.21%
99.39%	95.41%	97.97%	98.93%
99.38%	93.09%	97.56%	98.87%
99.19%	88.98%	96.14%	98.20%
99.14%	86.81%	95.38%	97.94%
98.90%	87.27%	94.71%	97.28%
98.99%	86.97%	95.44%	97.62%
98.77%	85.42%	94.66%	97.43%
99.19%	90.03%	96.33%	98.08%
99.31%	91.55%	97.14%	98.62%
99.45%	91.16%	97.04%	98.58%
99.57%	92.17%	97.31%	98.69%
99.68%	90.34%	97.05%	98.74%
99.66%	89.73%	96.75%	98.62%

		Three-To-Five-Day	
Percent Within +3-Day	Overall Score	Percent Within +1-Day	•
99.57%	89.63%	96.56%	99.08%
99.47%	92.12%	97.30%	98.84%
99.48%	91.20%	97.31%	98.85%
99.51%	93.49%	97.79%	99.02%
99.47%	91.38%	97.48%	98.85%
99.39%	90.73%	97.02%	98.71%
99.42%	92.26%	97.72%	98.89%
99.54%	94.58%	98.09%	99.12%
99.46%	93.49%	97.90%	98.98%
99.45%	93.81%	98.03%	99.04%
99.43%	92.80%	97.64%	98.93%
99.43%	92.55%	97.76%	98.93%
99.41%	93.28%	97.79%	98.89%
99.52%	93.29%	98.40%	99.24%
99.25%	92.28%	96.21%	98.20%
99.22%	91.85%	97.17%	98.63%
98.86%	89.04%	95.79%	98.05%
98.78%	91.58%	96.75%	98.31%
98.88%	89.85%	96.10%	98.02%
98.97%	89.65%	96.13%	98.12%
99.03%	89.27%	96.00%	98.13%
99.22%	91.24%	96.92%	98.53%
99.41%	92.29%	97.23%	98.66%
99.43%	90.12%	97.01%	98.66%
99.30%	90.42%	96.85%	98.44%
99.40%	91.80%	97.18%	98.65%
99.44%	90.62%	97.18%	98.70%
99.56%	90.85%	97.87%	99.07%
99.39%	90.92%	95.16%	97.57%
99.28%	91.14%	97.39%	98.45%
99.04%	84.47%	94.92%	97.83%
98.84%	81.63%	93.50%	97.17%
98.30%	83.46%	93.22%	96.73%
98.62%	82.62%	93.40%	96.63%
98.61%	80.35%	92.28%	96.34%
98.90%	84.12%	94.34%	97.25%
99.18%	86.55%	95.67%	97.97%
99.23%	86.70%	95.70%	97.94%
99.28%	87.31%	95.36%	97.59%
99.33%	85.96%	95.35%	97.81%
99.32%	81.41%	93.07%	96.86%

	Two-Day		-Day
Percent Within +3-Day	Overall Score	Percent Within +1-Day	Percent Within +2-Day
99.48%	92.34%	96.91%	98.02%
99.40%	93.04%	97.00%	98.34%
99.35%	93.13%	97.50%	98.63%
99.45%	93.10%	97.48%	98.41%
99.28%	93.02%	97.38%	98.60%
99.30%	92.23%	97.12%	98.40%
99.33%	92.86%	97.27%	98.42%
99.48%	93.48%	97.55%	98.41%
99.38%	93.19%	97.30%	98.51%
99.44%	93.51%	97.60%	98.65%
99.37%	93.10%	97.39%	98.50%
99.38%	92.60%	97.13%	98.34%
99.36%	93.30%	97.26%	98.36%
99.48%	92.61%	97.35%	98.38%
99.15%	94.45%	97.66%	98.75%
99.20%	92.23%	97.03%	98.48%
98.99%	91.72%	96.68%	98.18%
98.98%	92.31%	96.85%	98.18%
98.88%	92.16%	96.89%	98.28%
98.90%	91.72%	96.80%	98.23%
98.94%	91.76%	96.63%	98.08%
99.10%	92.42%	97.13%	98.40%
99.34%	93.24%	97.43%	98.40%
99.24%	92.59%	97.29%	98.61%
99.09%	92.41%	97.10%	98.37%
99.21%	92.82%	97.42%	98.62%
99.31%	92.34%	97.16%	98.41%
99.42%	91.68%	97.39%	98.59%
98.83%	93.63%	97.49%	98.77%
99.05%	90.80%	96.69%	98.13%
98.90%	88.54%	96.10%	97.94%
98.52%	85.06%	94.39%	97.17%
98.13%	86.43%	94.81%	97.33%
98.15%	85.54%	94.83%	97.45%
98.00%	85.33%	94.34%	97.05%
98.38%	87.82%	95.48%	97.60%
98.83%	89.35%	96.21%	97.95%
98.88%	90.21%	96.61%	98.21%
98.79%	89.71%	96.25%	97.74%
98.81%	88.81%	96.44%	98.37%
98.45%	89.19%	96.16%	98.11%

Single Piece First-Class			
	Three-To-Five-Day		
Percent Within +3-Day	Overall Score	Percent Within +1-Day	Percent Within +2-Day
98.63%	79.01%	93.35%	96.86%
98.87%	80.78%	91.64%	96.38%
99.10%	81.83%	94.11%	97.16%
99.03%	86.64%	94.97%	97.40%
99.07%	79.96%	94.47%	97.38%
98.94%	80.76%	93.82%	96.89%
98.91%	83.48%	94.85%	97.35%
98.96%	87.33%	94.90%	97.38%
98.99%	84.33%	95.07%	97.37%
99.12%	85.26%	95.22%	97.53%
98.98%	84.15%	94.70%	97.32%
98.89%	83.72%	94.50%	97.09%
98.87%	84.84%	94.71%	97.07%
98.91%	84.81%	95.59%	97.71%
99.16%	86.13%	93.95%	96.59%
99.02%	82.99%	94.38%	97.24%
98.82%	80.52%	92.44%	96.33%
98.80%	82.45%	93.60%	96.59%
98.83%	81.00%	92.86%	96.22%
98.85%	80.47%	92.89%	96.37%
98.73%	78.28%	91.73%	96.01%
98.94%	82.76%	93.93%	96.88%
99.03%	84.81%	93.86%	96.85%
99.10%	78.33%	93.50%	96.99%
98.91%	80.76%	93.27%	96.69%
99.13%	82.58%	94.09%	97.02%
98.96%	80.97%	93.42%	96.84%
99.14%	80.96%	95.04%	97.83%
99.24%	83.69%	93.19%	96.37%
98.92%	80.43%	93.51%	96.25%
98.70%	71.92%	89.69%	95.29%
98.31%	66.73%	87.15%	93.76%
98.38%	69.63%	88.05%	94.08%
98.50%	67.69%	87.57%	93.71%
98.21%	66.41%	86.26%	93.23%
98.50%	71.71%	89.25%	94.72%
98.77%	75.64%	91.34%	95.69%
98.87%	76.55%	91.98%	96.03%
98.70%	78.83%	91.86%	95.86%
99.00%	75.68%	92.58%	96.34%
98.86%	71.51%	88.66%	94.62%

Percent Within	
	97.74%
	97.93%
	98.37%
	98.51%
	98.38%
	98.20%
	98.35%
	98.46%
	98.31%
	98.55%
	98.38%
	98.23%
	98.18%
	98.48%
	98.15%
	98.41%
	97.89%
	97.94%
	97.65%
	97.89%
	97.73%
	98.06%
	98.34%
	98.18%
	98.05%
	98.29%
	98.22%
	98.67%
	98.11%
	97.93%
	97.51%
	96.60%
	96.69%
	96.50%
	96.23%
	96.89%
	97.55%
	97.69%
	97.86%
	97.78%
	97.15%